## **REMARKS**

The present application was filed on December 29, 2000 with claims 1-29. Claims 1-3, 5-11, 13-18 and 20-31 are pending and claims 1, 8, 16 and 23 are the pending independent claims.

In the outstanding Office Action dated March 8, 2004, the Examiner: (i) rejected claims 1, 4, 16 and 19 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,297,249 to Bernstein et al. (hereinafter "Bernstein"); (ii) rejected claims 8 and 23 under 35 U.S.C. §102(a) as being anticipated by U.S. Patent No. 6,029,245 to Scanlan (hereinafter "Scanlan"); (iii) rejected claims 2, 3, 5, 6, 17, 18, 20 and 21 under 35 U.S.C. §103(a) as being unpatentable over Bernstein; (iv) rejected claims 7 and 22 under 35 U.S.C. §103(a) as being unpatentable over Bernstein in view of U.S. Patent No. 5,421,008 to Banning et al. (hereinafter "Banning"); (v) rejected claims 9-12 and 24-26 under 35 U.S.C. §103(a) as being unpatentable over Scanlan; (vi) rejected claims 13, 14, 27 and 28 under 35 U.S.C. §103(a) as being unpatentable over Scanlan in view of Bernstein; and (vii) rejected claims 15 and 29 under 35 U.S.C. §103(a) as being unpatentable over Scanlan in view of Banning.

In response to the Office Action, claims 1-3, 5, 7-11, 13-18 and 20-29 have been amended claims 4, 12 and 19 have been canceled, and claims 30 and 31 have been added.

With regard to the rejection of claims 1, 4, 16 and 19 under 35 U.S.C. §102(b) as being anticipated by Bernstein, Applicant asserts that Bernstein fails to disclose the elements of independent claims 1 and 16 as amended. Dependent claims 4 and 19 have been canceled.

Independent claims 1 and 16 recite techniques for managing target documents referred to by referring documents. One or more referring documents are identified as having at least one hypertext link pointing to a target document in storage. When it is determined that the at least one hypertext links of the one or more referring documents ceases to exist, the target document is enabled to be removed from storage. Support for the amendments to claims 1 and 16 can be found on pages 2, 3 and 11 of the specification.

The portion of Bernstein cited by the Examiner with regard to this rejection describes database maintenance and, more particularly, maintenance when a document, link marker or link is created, changed or deleted. If a document is to be deleted, the link markers in the document are identified and then removed in a looping process. The removal of link markers involves identifying

and deleting links attached to the link marker and rewriting the other end link marker. When no link markers remain in the document, the document is deleted from the database.

Bernstein describes the identification and removal of hypertext links in a single document and the removal of that document. Thus, Bernstein fails to disclose the identification of one or more referring documents having hypertext links pointing to a target document, the determination of when the hypertext links pointing to the target document cease to exist, and the enablement of removal of the target document from storage when the hypertext links cease to exist. Accordingly, withdrawal of the rejection to claims 1 and 16 under 35 U.S.C. §102(b) is therefore respectfully requested.

With regard to the rejection of claims 8 and 23 under 35 U.S.C. §102(a) as being anticipated by Scanlan, Applicant asserts that Scanlan fails to disclose the elements of independent claims 8 and 23. Independent claims 8 and 23 have been amended to more clearly recite the present invention.

Independent claims 8 and 23 recite techniques for providing security for target documents referred to by referring documents. A first referring document having a hyperlink pointing to a target document stored in a storage is identified. The first referring document has a security access requirement which is applied to the target document.

The portion of Scanlan cited by the Examiner discloses dynamic assignment of security parameters to web pages. A security injection profile is provided for storing security parameters for each security protocol. When a browser enabled with a particular security protocol requests an HTML page in the secure set, the page is accessed from web server storage, security parameters of the protocol are accessed and injected into the access page, and the page is sent to the browser.

Scanlan describes the injection of security parameters into a web page from a web browser. Thus, although Scanlan describes use of a hyperlink to request an HTML page that requires security, it fails to disclose the application of a security access requirement from a first referring document to the target document to which the hypertext link points. Accordingly, withdrawal of the rejection to claims 8 and 23 under 35 U.S.C. §102(a) is therefore respectfully requested.

With regard to the rejection of claims 2, 3, 5, 6, 17, 18, 20 and 21 under 35 U.S.C. §103(a) as being unpatentable over Bernstein, Applicant asserts that such claims are patentable by virtue of

their dependency from respective independent claims 1 and 16. Claims 2, 3, 5, 17, 18, 20 and 21 have been amended to more clearly recite the present invention.

Further, one or more of dependent claims 2, 3, 5, 6, 17, 18, 20 and 21 contain patentable subject matter in their own right. For example, Bernstein fails to disclose the steps of decrementing a counter when a hypertext link ceases to exist, and determining whether the count for the counter of the target document equals zero. The Office Action makes statements based on subject belief and unknown authority in rejecting these claims, which provides insufficient support for an obviousness rejection. Accordingly, withdrawal of the rejection to claims 2, 3, 5, 6, 17, 18, 20 and 21 under 35 U.S.C. §103(a) is therefore respectfully requested.

With regard to the rejection of claims 7 and 22 under 35 U.S.C. §103(a) as being unpatentable over Bernstein in view of Banning, Applicant asserts that such claims are patentable by virtue of their dependency from respective independent claims 1 and 16. Claims 7 and 22 have been amended to more clearly recite the present invention. Further, one or more of dependent claims 7 and 22 contain patentable subject matter in their own right. Accordingly, withdrawal of the rejection to claims 7 and 22 under 35 U.S.C. §103(a) is therefore respectfully requested.

With regard to the rejection of claims 9-12 and 24-26 under 35 U.S.C. §103(a) as being unpatentable over Scanlan, Applicant asserts that claims 9-11 and 24-26 are patentable by virtue of their dependency from respective independent claims 8 and 23. Claims 9-11 and 24-26 have been amended to more clearly recite the present invention. Claim 12 has been canceled.

Further, one or more of dependent claims 9-11 and 24-26 contain patentable subject matter in their own right. For example, Scanlan fails to disclose the identification of a second referring document having a hypertext link pointing to the target document, the determination of whether the second referring document has the security access requirement, and the prevention of the second referring document from accessing the target document if the second referring document does not have the security access requirement. The Office Action makes statements based on subject belief and unknown authority in rejecting these claims which provides insufficient support for an obviousness rejection. Accordingly, withdrawal of the rejection to claims 9-11 and 24-26 under 35 U.S.C. §103(a) is therefore respectfully requested.

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With regard to the rejection of claims 13, 14, 27 and 28 under 35 U.S.C. §103(a) as being

unpatentable over Scanlan in view of Bernstein, Applicant asserts that such claims are patentable by

virtue of their dependency from respective independent claims 8 and 23. Claims 13, 14, 27 and 28

have been amended to more clearly recite the present invention. Further, one or more of dependent

claims 13, 14, 27 and 28 contain patentable subject matter in their own right. Accordingly,

withdrawal of the rejection to claims 13, 14, 27 and 28 under 35 U.S.C. §103(a) is therefore

respectfully requested.

With regard to the rejection of claims 15 and 29 under 35 U.S.C. §103(a) as being

unpatentable over Scanlan in view of Banning, Applicant asserts that such claims are patentable by

virtue of their dependency from respective independent claims 8 and 23. Claims 15 and 29 have

been amended to more clearly recite the present invention. Further, one or more of dependent claims

15 and 29 contain patentable subject matter in their own right. Accordingly, withdrawal of the

rejection to claims 15 and 29 under 35 U.S.C. §103(a) is therefore respectfully requested.

Claims 30 and 31 have been added to recite that a hypertext link pointing to a target

document ceases to exist when the hypertext link is deleted or when a referring document having the

hypertext link is deleted. Support for these claims can be found on page 11, paragraph 2 of the

specification.

In view of the above, Applicant believes that claims 1-3, 5-11, 13-18 and 20-31 are in

condition for allowance, and respectfully requests withdrawal of the §102(b), §102(a) and §103(a)

rejections.

Date: July 8, 2004

Respectfully submitted,

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